

1 ROBERTA J. BURNETTE (Bar No. 131652)
2 DENTONS US LLP
3 601 South Figueroa Street, Suite 2500
4 Los Angeles, California 90017-5704
5 Telephone: (213) 623-9300
6 Facsimile: (213) 623-9924
7 E-mail: roberta.burnette@dentons.com

8 JEFFREY D. HARTY (admitted *Pro Hac Vice*)
9 MCKEE VOORHEES & SEASE, PLC
10 801 Grande Avenue, Suite 3200
11 Des Moines, Iowa 50265
12 Telephone: (515) 288-3667
13 E-mail: harty@ipmvs.com

14 Attorneys for Plaintiff
15 PERMA-LINER INDUSTRIES, LLC

JS-6

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18 PERMA-LINER INDUSTRIES, LLC,

19 No. CV 13-09546 DDP (Ex)

20 Plaintiff,

21 v.
22 **STIPULATED CONSENT
23 JUDGMENT AND PERMANENT
24 INJUNCTION**

25 JEFF VEGA d/b/a PERMO-LINER,

26 Defendant.

27 Pursuant to the Settlement Agreement reached between Plaintiff and
28 Defendant, the foregoing stipulation of the Parties, and for good cause shown, the
Court hereby enters the following Stipulated Consent Judgment and Permanent
Injunction:

29 //

30 //

31 //

32 //

33 [

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1 **STIPULATED CONSENT JUDGMENT AND PERMANENT INJUNCTION**

2 1. The Court has jurisdiction over the parties and the subject matter of
3 this case.

4 2. Plaintiff is the owner of trademark rights in the mark PERMA-LINER
5 relating to cured-in-place pipelining technology and pipeline rehabilitation services,
6 said trademark rights including common law rights and U.S. Trademark
7 Registration No. 2,893,521 ("the '521 Registration").

8 3. The PERMA-LINER mark and the '521 Registration are valid and
9 enforceable.

10 4. Defendant has used the mark PERMO-LINER in commerce in
11 connection with cured-in-place pipelining products and services.

12 5. Defendant's use of the PERMO-LINER mark infringes Plaintiff's
13 common law trademark rights and the '521 Registration and constitutes unfair
14 competition.

15 6. Defendant and all agents, servants, employees, and/or other persons
16 who are in active concert or participation therewith are immediately and forever
17 enjoined from all future use of the trade name or trademark PERMO-LINER
18 in any manner whatsoever, including as part of a domain name, and shall not adopt
19 or use any trade name, trademark or domain name including the words PERMA,
20 PERMO, PRIMA, PRIMO, PREMA, PREMO, or any similar variation thereof for
21 use in connection with pipelining products and/or services.

22 IT IS SO ORDERED.

23
24 Dated: June 27, 2014



25 United States District Court Judge
26 Central District of California